

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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CLAYTON PLUMTREE,

Plaintiff,

v.

CITY OF NAPERVILLE, et al.

Defendants.

Case No: 1:22-cv-6635

Judge Pallmeyer

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**Statement to the Court regarding the Status of Discovery**

Pursuant to the Court's instructions and the applicable procedural rules, Plaintiff hereby provides an update on the current status of ongoing discovery obligations in this matter:

1. Responses and Document Production: Plaintiff has responded to Defendant's First Set of Requests for Production. In addition to the initial document productions, Plaintiff has produced an additional 145 pages of documents, which were recently identified as relevant to the issues at hand. These documents have been provided to Defendant to ensure a thorough and expedient discovery process.
2. Deposition Scheduling: Plaintiff has also provided the names and tentative availability of three additional individuals required for deposition. These individuals are retired sergeants and police officers from the Naperville Police Department.
3. 30(b)(6) Deposition Notice: Plaintiff is currently reviewing the transcripts from earlier depositions and analyzing Defendants' supplemental discovery responses and document productions to finish drafting the Notice for the 30(b)(6) deposition of Defendant's designated representative(s). Plaintiff anticipates that this Notice will be completed and duly served upon Defendant by this Monday.

Plaintiff remains committed to proceeding in a timely and efficient manner and will continue to update the Court and Defendant as further progress is made or if any issues arise necessitating judicial intervention.

Respectfully Submitted,

Gianna Basile

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he served the foregoing document on all counsel of record via this Court's CM/ECF Filing System on May 2, 2024, and that such counsels are registered e-filers.

s/ Gianna Basile, ESQ.